

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION

In Re:)
) Bankruptcy Case No. 19-31416
DENNIS EUGENIO VILCHEZ and)
MONSE YVETTE PEREZ,) Chapter 7
)
Debtors.)

EX PARTE MOTION TO EMPLOY REALTOR

TO: Hon. Judge Whitley Presiding

NOW COMES, Richard M. Mitchell, the Chapter 7 Trustee (the "Trustee") who respectfully moves the Court pursuant to 11 U.S.C. Sec. 327(a) for authority to employ a realtor for the purpose of listing and sale of real property (the "Real Estate"). In support of his motion, the Trustee shows as follows:

1. The Estate owns one or more parcels of real property that can be sold for the benefit of the creditors.
2. The services of an experienced realtor are required in order to list and sell the Real Estate.
3. Brian Bain of Keller Williams Realty is a licensed realtor who the Trustee knows to be qualified to perform the services he requires in this case.
4. Brian Bain is a disinterested person.

WHEREFORE the Trustee prays that he be authorized to employ Brian Bain of Keller Williams Realty with any future commissions or expenses to be approved by the Court.

DATED this the 6th day of December, 2019.

/s/ Richard M. Mitchell
Richard M. Mitchell, NC Bar No. 3034
Trustee
2820 Selwyn Avenue, Suite 803
Charlotte, North Carolina 28209
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AFFIDAVIT

I, Brian Bain of Keller Williams Realty, under penalty of perjury, hereby state that I neither hold nor represent an interest adverse to the estate and am a disinterested person as is required by 11 U.S.C. Sec327(a).

Dated this the 6th day of December

/s/ Brian Bain
Brian Bain

CERTIFICATE OF SERVICE

I hereby certify that on the 6th day of December, 2019, I electronically filed the foregoing Trustee's Ex Parte Motion to Employ Realtor for the Trustee with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following parties:

Shelley K. Abel
U.S. Bankruptcy Administrator

David R. Badger
Attorney for Debtors

/s/ Richard M. Mitchell
Richard M. Mitchell, NC Bar No. 3034
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